

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JONATHAN HARRIS,

Plaintiffs,

-against-

CITY OF NEW YORK; Detective BRIAN TAYLOR,  
Shield No. 4438; Police Officer NEIL MAGLIANO, Shield  
No. 2766; Police Officer SEAN NOCE, Shield No. 31328;  
and JOHN and JANE DOE 1 through 10, individually and  
in their official capacities (the names John and Jane Doe  
being fictitious, as the true names are presently unknown),

Defendants.  
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**NOTICE OF MOTION FOR  
SUMMARY JUDGMENT  
LIMITED TO THE ISSUE OF  
QUALIFIED IMMUNITY**

15 CV 8456 (CM)

**PLEASE TAKE NOTICE** that the undersigned will move this Court, before the Honorable Colleen McMahon, at the United States Courthouse for the Southern District of New York, located at 500 Pearl St., New York, NY, on a date to be determined by the Court, for an Order, pursuant to Rule 56 of the Federal Rules of Civil Procedure, limited at this time to the issue of qualified immunity, dismissing plaintiff's complaint against defendants City of New York, Detective Brian Taylor, Police Officer Neil Magliano and Police Officer Sean Noce, with prejudice, and for such other and further relief as the Court may deem just and proper.

**PLEASE TAKE FURTHER NOTICE** that pursuant to the individual practice rules of the Honorable Colleen McMahon, discovery in this matter is stayed, except for plaintiff's depositions, which will take place in the next 30 days.

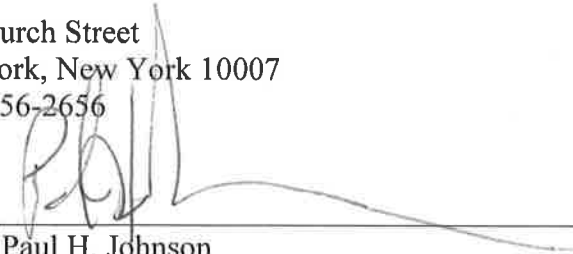
**PLEASE TAKE FURTHER NOTICE** that pursuant to the individual practice rules of the Honorable Colleen McMahon, defendants' briefs and papers addressing the issue of qualified immunity shall be served and filed by June 1, 2016.

**PLEASE TAKE FURTHER NOTICE** that pursuant to the individual practice rules of the Honorable Colleen McMahon, plaintiffs' opposition papers shall be served and filed by June 15, 2016.

**PLEASE TAKE FURTHER NOTICE** that pursuant to the individual practice rules of the Honorable Colleen McMahon, defendants' reply papers shall be served and filed by June 29, 2016.

Dated: New York, New York  
May 2, 2016

ZACHARY W. CARTER  
Corporation Counsel of the  
City of New York  
*Attorney for Defendants City, Taylor, Magliano and  
Noce*  
100 Church Street  
New York, New York 10007  
(212) 356-2656

By:   
Paul H. Johnson  
Assistant Corporation Counsel  
Special Federal Litigation Division

To: VIA ECF  
Gabriel Harvis, Esp. (via ECF)  
*Attorney for Plaintiff*